

CHRISTINE O. GREGOIRE  
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Director



COLSF  
Colbert 7.3 V1

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

November 8, 1989

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SUPERFUND BRANCH

Mr. Neil Thompson  
EPA Region 10  
Superfund Group (HW-113)  
1200 Sixth Avenue  
Seattle, Washington 98101

RE: Ecology's Comments on the Second Draft of the Colbert Landfill  
Quality Assurance Project Plan (QAPjP)

Dear Neil:

The following are:

1. Ecology's responses/reactions to Landau's letter of 9/28/89  
(Landau's responses to EPA/Ecology comments) on the QAPjP;  
and
2. Ecology's responses to Mike Schlender's review of QAPjP  
dated 10/23/89. (Received by Telefax on 11/6/89)

We agree and accept the responses by Landau to the following comments,  
listed by comment number: 2, 3, 4, 5, 9, 14, 15, 17, 18, 24, 25, 26,  
27, 28, 30, 31, 33, 34, 35, 36, 38, 40, and 41.

The following are our follow-up responses, listed by comment number:

- #1 Defer the response to EPA (Mike Schlender)
- #6 If the VOA samples are acidified after the bottles are  
filled with liquid, Landau should be permitted to empty,  
refill, and re-acidify the VOA bottle if air bubbles are  
encountered after the lid is screwed on. A new bottle does  
not seem justified. My understanding is that only about 2  
drops of acid are used to preserve the samples. Also, are  
acidified VOA samples required, or only recommended?
- #7 Defer the response to EPA
- #8 Defer the response to EPA
- #10 Defer the response to EPA

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#11 Defer the response to EPA

#12 Defer the response to EPA

#13 Defer the response to EPA

#16 Defer the response to EPA

#19 Defer the response to EPA

#20 Defer the response to EPA

#21 Defer the response to EPA

#22 Defer the response to EPA

#23 Defer the response to EPA

#29 What about cadmium and silica? These two constituents should be tested for along with the other major ions. Cadmium is a primary drinking water quality standard metal as well as being a common landfill contaminant. The State's MFS requirements include cadmium analyses, so the data generated during this phase of the project will be useful later on, when the County is complying with the MFS. Silica is useful in determining the age of the water being tested. Both silica and cadmium analyses are inexpensive and will provide useful data for aquifer characterization. Ecology would like to see cadmium and silica included in the list.

#32 The Consent Decree Scope of Work states,  
"During the first month after pumping of the pilot extraction well begins, samples for chemical analysis will be obtained at least weekly from the extraction well and at least the two closest monitoring wells. After this initial 4-week period, the pilot extraction well and the monitoring wells will be sampled and analyzed at least quarterly during operation of the pilot system." (See IV.A.2.b. (Page IV-4))  
If the pilot treatment system discharge levels have not stabilized after the first month (sampled weekly), then sampling more often than quarterly is needed to ensure that the discharge limits are not being exceeded. Also, more frequent sampling and analysis will provide the needed information upon which to design and build the full scale treatment system. Another location where this may be addressed is in the Phase I Treatment and Discharge Plan to be submitted about May 1990. What do you think of that idea?

#37 Defer response to EPA

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#39 Defer response to EPA

#42 Defer response to EPA

#43 Defer response to EPA

Ecology agrees and accepts all the responses provided by Mike Schlender in his memo to you dated 10/23/89.

If you have any questions regarding the above, please give me a call at (206)438-3043. Will you be writing a new comment letter or just attaching a cover letter to go along with Mike Schlender's memo to you? Since I do not know what you will be doing, I would like to see the final draft of the letter to Dean Fowler and Larry Beard before it is mailed out, to see any last minute changes and to see if our few additional comments are included.

Sincerely,

*Mike Blum*

Mike Blum, Project Manager  
Landfill Site Cleanup Section  
Hazardous Waste Investigations and  
Cleanup Program

MB:clr

cc: Alex Coleman, Ecology  
Russ Darr, Ecology  
Ravi Krishnaiah, Ecology  
Mike Schlender, EPA Seattle